

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ZAFAR ABEDI

Plaintiff,

V.

CIVIL ACTION NO. 4:09-CV-02897

WORLD'S GOLD & DIAMOND, INC.,

NASRUDDIN RUPANI,

FARIDA RUPANI

Defendants.

DEFENDANTS' OFFER OF JUDGMENT

Defendants, World's Gold & Diamonds, Inc., Nasruddin Rupani, and Farida Rupani make the following Offer of Judgment pursuant to Federal Rule of Civil Procedure 68:

1. Defendants make this Offer of Judgment more than fourteen (14) days before this case is set for docket call. FED. R. CIV. P. 68; *see Perkins v. US West Comms.*, 138 F.3d 336, 339 (8th Cir. 1998).

2. Defendants offer \$17,362.80 for which judgment may be entered. *See Herrington v. County of Sonoma*, 12 F.3d 901, 907 (9th Cir. 1994).

3. This offer is unconditional. *See Herrington*, 12 F.3d at 907.

4. Defendants agree to pay costs accrued to date. *Id.*

5. To the extent not included as costs, Defendants also agree to pay reasonable attorneys' fees as determined by the Court.

6. This offer is made for the settlement of all claims for damages against Defendants World's Gold & Diamonds, Inc., Nasruddin Rupani, and Farida Rupani.

7. This Offer of Judgment shall remain open and irrevocable for fourteen (14) days after service upon Plaintiff. *See Perkins*, 138 F.3d at 339. If Plaintiff does not respond within

fourteen (14) days after service, the Offer is deemed withdrawn. FED. R. CIV. P. 68.

Respectfully submitted,

MARTIN, DISIERE, JEFFERSON & WISDOM, L.L.P.

By: W. Jackson Wisdom
W. Jackson Wisdom
Fed. ID No. 13756
State Bar No. 21804025

808 Travis Street, Suite 1800
Houston, Texas 77002
Telephone: (713) 632-1700
Facsimile: (713) 222-0101

**ATTORNEY-IN-CHARGE FOR DEFENDANTS,
WORLD'S GOLD & DIAMOND, INC., NASRUDDIN
RUPANI, FARIDA RUPANI**

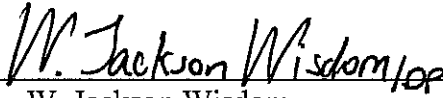
OF COUNSEL:

James M. Cleary, Jr.
Fed. ID No. 15499
State Bar No. 00783838
Diana Pérez Gomez
Fed. ID. No. 13945
State Bar No. 24041674
MARTIN, DISIERE, JEFFERSON & WISDOM, L.L.P.
808 Travis Street, Suite 1800
Houston, Texas 77002
Telephone: (713) 621-1700
Facsimile: (713) 222-0101

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above pleading has been forwarded via certified mail, return receipt requested, on this the 5th day of January, 2010 to:

Linda D. King
Mark D. Goranson
GoransonKing, PLLC
550 Westcott, Suite 415
Houston, Texas 77007



W. Jackson Wisdom